

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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May 20, 2025

**BY ECF**

Hon. Lorna G. Schofield  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Application Granted in part. By **May 28, 2025**, the Government shall file a letter identifying any outstanding Rule 16 discovery. Defendant's motion(s), if any, shall be filed by **July 28, 2025**. The Government's response shall be filed by **August 11, 2025**. Defendant's reply shall be filed by **August 18, 2025**. The status conference currently scheduled for July 14, 2025, will proceed as scheduled. The Clerk of the Court is directed to terminate the letter motion at docket number 11.

**RE: United States v. Edwin Medina-Guarache**  
**25 Cr. 80 (LGS)**



**LORNA G. SCHOFIELD**

**UNITED STATES DISTRICT JUDGE**

Dear Judge Schofield:

I write, with the government's consent, to respectfully request a 60-day extension to file Rule 12 motions in the above-captioned matter. I also request, with the government's consent, corresponding extensions of all other deadlines and adjournment of Mr. Medina-Guarache's status conference.

On March 11, 2025, the Court ordered the government to produce discovery by March 21, 2025. In the same order, the Court directed the defense to file motions by May 27, 2025, with the government's response due June 10, 2025 and the defense's reply by June 17, 2025. The Court set a status conference for July 14, 2025 at 10:30 am.

The defense does not believe the government's discovery production is complete. After receiving an initial production from the government, on March 26, 2025, the defense sent the government a detailed request for specific Rule 16 discovery necessary for motions practice. On April 28, the government produced additional discovery, disclosing some but not all of the requested discovery. On May 12, the defense sent another email reiterating its request. On May 15, the parties spoke by phone. The defense is awaiting the remainder of the government's production. In addition, the parties have begun to engage in plea discussions.

For these reasons, the defense respectfully requests a 60-day extension to file motions with a corresponding extension for responses and replies, along with a 60-day adjournment of Mr. Medina-Guarache's status conference, currently scheduled for July 14, 2025.

The government also requests, with the defense's consent, that the Court exclude time through the next-scheduled conference under the Speedy Trial Act to allow Mr. Medina-Guarache

to continue to receive and review discovery, to evaluate whether to file any pretrial motions, and for the parties to discuss a potential pretrial resolution of this case. *See* 18 U.S.C. § 3161(h)(7)(A).

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.

*Counsel for Edwin Medina-Guarache*

cc: Counsel of record

**SO ORDERED:**

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**THE HONORABLE LORNA G. SCHOFIELD**  
United States District Judge